

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AVI ALEXANDER RACHLIN,

Plaintiff,

-against-

GEORGE K. BAUMANN, in his
official capacity as Chief of Police of
the FREEHOLD TOWNSHIP POLICE
DEPARTMENT and FREEHOLD
TOWNSHIP,

Defendants.

HON. FRED A. L. WOLFSON,
U.S.D.J.

HON. TONIANNE J.
BONGIOVANNI, U.S.M.J.

CIVIL ACTION No. 3:21-cv-
15343

CIVIL ACTION

(ELECTRONICALLY FILED)

Motion Date: May 2, 2022

NOTICE OF MOTION TO SEAL DOCUMENTS

PLEASE TAKE NOTICE that on May 2, 2022, Plaintiff, Avi Alexander Rachlin, will move the Honorable Tonianne J. Bongiovanni, U.S.M.J., at the United States Courthouse, Clarkson S. Fisher Federal Building and United States Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order, pursuant to L. Civ. R. 5.3, sealing the following documents on the case docket: ECF Nos. 9-3, 19-3, 19-6, 21, 21-2, 23, 24, 27, 27-1, 27-3, 29, and 30.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Plaintiff relies upon the accompanying documents:

- 1) Declaration of Plaintiff dated April 3, 2022,

- 2) Declaration of Edward A. Paltzik dated April 3, 2022, and accompanying Exhibit 1 (ECF No. 32 – Temporary Order to Seal) and Exhibit 2 (Index in Support of Motion to Seal).

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Dated: April 3, 2022

Respectfully submitted,

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